

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

FRONTIER AIRLINES, INC.

Case No.: 1:20-cv-09713-LLS

Plaintiff,

v.

AMCK AVIATION HOLDINGS IRELAND
LIMITED, ACCIPITER INVESTMENT 4
LIMITED, VERMILLION AVIATION
(TWO) LIMITED, WELLS FARGO TRUST
COMPANY, N.A., solely in its capacity as
OWNER TRUSTEE, and UMB BANK,
N.A., solely in its capacity as OWNER
TRUSTEE,

Defendants.

**PLAINTIFF FRONTIER AIRLINES, INC.'S NOTICE OF
MOTION FOR ATTORNEY'S FEES, COSTS, AND EXPENSES**

PLEASE TAKE NOTICE that, pursuant to the Court's June 14, 2024, Order (Dkt. 170) and June 17, 2024, Judgment (Dkt. 171) finding Defendants AMCK Aviation Holdings Ireland Limited, Accipiter Investment 4 Limited, and Vermillion Aviation (Two) Limited (collectively, Defendants) "liable to Frontier for all losses, fees, costs, and expenses – including attorneys' fees – under the Original Leases and the Framework Agreement," Plaintiff Frontier Airlines, Inc. (Frontier) hereby moves this Court before the Honorable Louis L. Stanton, United States District Judge, at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, Courtroom 21C, New York, New York 10007, on a date and time to be determined by the Court, for an order granting Frontier's motion for attorney's fees and costs, which combined total \$2,581.727.09, ordering Defendants to pay Frontier this amount, and for such other relief as this Court may deem just and proper.

PLEASE TAKE FURTHER NOTICE that additional fees and costs incurred in connection with prosecuting this application or responding to any post-trial filings made by Defendants shall be sought in a supplemental filing.

PLEASE TAKE FURTHER NOTICE that, in support of its motion, Frontier will rely on the brief and the supporting Declaration of David G. Hosenpud, including exhibits, all of which are being electronically filed on this date.

DATED: July 1, 2024

LANE POWELL PC

By: s/ David G. Hosenpud

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